

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

RONNELL OLIVER

Plaintiff

v.

Civil Action No.: 1:12-cv-276-LG-JMR

AIG LIFE INSURANCE CO.,
et al.

Defendants

**DEFENDANT AMERICAN GENERAL LIFE INSURANCE COMPANY OF
DELAWARE’S MOTION FOR SUMMARY JUDGMENT**

Defendant American General Life Insurance Company of Delaware, formerly known as AIG Life Insurance Company (“American General Life”), hereby moves the Court for summary judgment under Federal Rule of Civil Procedure 56.

1. American General Life should be awarded summary judgment on all claims in Plaintiff’s Complaint because the decision to deny Plaintiff’s claim for Permanent Total Disability/Dismemberment benefits under the applicable Plan was based on and is supported by substantial evidence contained in the administrative record and is correct under the plain terms of the applicable Plan.

2. In support, American General Life submits the following documents:

- a. Memorandum In Support of Motion for Summary Judgment – to be filed under seal.
- b. Exhibit 1, the complete Administrative Record — to be filed under seal.

THEREFORE, for these reasons, along with those stated in the documents filed along with this Motion, the Court should grant American General Life summary judgment in its favor on all counts of Plaintiff’s Complaint.

Respectfully submitted, this 3rd day of October, 2013.

s/ John Dollarhide

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CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically transmitted the foregoing document to the Clerk of Court by using the CM/ECF system, which will send notification of such filing to the following:

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This 3rd day of October, 2013.

s/ John Dollarhide

John Dollarhide